The State of Utah

Department of Natural Resources

Division of Oil, Gas & Mining

ROBERT L. MORGAN
Executive Director

LOWELL P. BRAXTON
Division Director

OLENE S. WALKER
Governor

GAYLE F. McKEACHNIE
Lieutenant Governor

Inspection Report

Permit Number:	C0070038
Inspection Type:	TECHNICAL
Inspection Date:	Thursday, January 29, 2004
Start Date/Time:	01/29/2004 11:30:00 AM
End Date/Time:	01/29/2004 1:45:00 PM
Last Inspection:	

Representatives Present During the Inspection:

Company	Johnny Pappas Sr. Environmental Engineer
OGM	Pete Hess Environmental Scientist III

Inspector: Priscilla Burton, Environmental Scientist III

Weather: clear, cold (20 F), windy

InspectionID Report Number: 169

Accepted by: dhaddock
02/11/2004

Permitee: PLATEAU MINING CORP
Operator: PLATEAU MINING CORP
Site: WILLOW CREEK MINE
Address: 847 NW HWY 191, HELPER UT 84526
County: CARBON
Permit Type: PERMANENT COAL PROGRAM
Permit Status: ACTIVE

Current Acreages

14,670.00	Total Permitted
161.55	Total Disturbed
	Phase I
	Phase II
	Phase III

Mineral Ownership

- [x] Federal
- [ ] State
- [ ] County
- [x] Fee
- [x] Other

Types of Operations

- [x] Underground
- [ ] Surface
- [x] Loadout
- [ ] Processing
- [ ] Reprocessing

Report summary and status for pending enforcement actions, permit conditions, Divison Orders, and amendments:

Site visit to discuss chemical characteristics of refuse and backfilling & grading of Schoolhouse Canyon reclamation.

Inspector's Signature: /S/ **Date** Monday, February 09, 2004

Priscilla Burton, Environmental Scientist III
Inspector ID Number: 37

Note: This inspection report does not constitute an affidavit of compliance with the regulatory program of the Division of Oil, Gas and Mining

REVIEW OF PERMIT, PERFORMANCE STANDARDS PERMIT CONDITION REQUIREMENT

1. ***Substantiate the elements on this inspection by checking the appropriate performance standard.***
   a. ***For COMPLETE inspections provide narrative justification for any elements not fully inspected unless element is not appropriate to the site, in which case check Not Applicable.***
   b. ***For PARTIAL inspections check only the elements evaluated.***
2. ***Document any noncompliance situation by reference the NOV issued at the appropriate performance standard listed below.***
3. ***Reference any narratives written in conjunction with this inspection at the appropriate performace standard listed below.***
4. ***Provide a brief status report for all pending enforcement actions, permit conditions, Divison Orders, and amendments.***

	Evaluated	Not Applicable	Comment	Enforcement
1. Permits, Change, Transfer, Renewal, Sale	☐	☐	☐	☐
2. Signs and Markers	☐	☐	☐	☐
3. Topsoil	☐	☐	☑	☐
4.a Hydrologic Balance: Diversions	☐	☐	☐	☐
4.b Hydrologic Balance: Sediment Ponds and Impoundments	☐	☐	☐	☐
4.c Hydrologic Balance: Other Sediment Control Measures	☐	☐	☐	☐
4.d Hydrologic Balance: Water Monitoring	☐	☐	☐	☐
4.e Hydrologic Balance: Effluent Limitations	☐	☐	☐	☐
5. Explosives	☐	☐	☐	☐
6. Disposal of Excess Spoil, Fills, Benches	☐	☐	☐	☐
7. Coal Mine Waste, Refuse Piles, Impoundments	☑	☐	☑	☐
8. Noncoal Waste	☐	☐	☐	☐
9. Protection of Fish, Wildlife and Related Environmental Issues	☐	☐	☐	☐
10. Slides and Other Damage	☐	☐	☐	☐
11. Contemporaneous Reclamation	☐	☐	☐	☐
12. Backfilling And Grading	☐	☐	☐	☐
13. Revegetation	☐	☐	☐	☐
14. Subsidence Control	☐	☐	☐	☐
15. Cessation of Operations	☐	☐	☐	☐
16.a Roads: Construction, Maintenance, Surfacing	☐	☐	☐	☐
16.b Roads: Drainage Controls	☐	☐	☐	☐
17. Other Transportation Facilities	☐	☐	☐	☐
18. Support Facilities, Utility Installations	☐	☐	☐	☐
19. AVS Check	☐	☐	☐	☐
20. Air Quality Permit	☐	☐	☑	☐
21. Bonding and Insurance	☐	☐	☐	☐
22. Other	☐	☐	☐	☐

3. Topsoil

Surface soil and vegetation from existing Schoolhouse Canyon reclamation has been pushed to the south side of the canyon in a windrow. Topsoil at Gravel Cyn has been disturbed by exploratory digging.

7. Coal Mine Waste, Refuse Piles, Impoundments

The new reclamation design for School House Canyon requires moving 172,318 tons of refuse and 20,508 tons of Pond 013 fill material to create a drainage channel down the center of the canyon to the culvert leading to the Price River (Section 3.4-6(2) and Table 3.4-5 of Task #1788). Cuts will be from 20 to 40 feet deep in the existing surface of the refuse, exposing buried coal mine waste (Ex. 3.4-10, Task #1788). Coal Mine Waste buried in the fill of Schoolhouse Canyon may have high boron content as represented by samples taken in 1982 by Native Plants Inc. (v.4 Ex 5, Soil Sample Analysis Data) and Willow Creek Mine 1996 Soils Analyses (v. 5 sample ID sites WC96-2, WC96-4, WC96-5, WC96-10). The latter samples represent the approximately 460,000 cu yds of waste transported from the Willow Creek Disposal site (AML/007/907 Phase III, pp93,98,104) to Schoolhouse Canyon. This waste was reported to have hot water soluble boron levels between 10 - 95 ppm. I indicated that some sampling of the graded surface for pH, EC, SAR, boron, and texture may be required prior to placement of the topsoil over the waste in Schoolhouse Canyon, since the deep cuts would likely re-expose high boron waste.

Mr. Pappas indicated that he could provide records to identify the burial location of the AML waste within the pile and thereby avoid re-exposing this waste. Mr. Pappas suggested that the waste had been covered with approximately 80 feet of refuse subsequent to its disposal at the Schoolhouse refuse site and that two switchbacks had been added to the canyon since the Willow Creek mine had received their permit in 1996. Mr. Pappas stated that only the "D" seam had been mined by Willow Creek, so that roof and floor analyses from other seams were not pertinent to the discussion of mine waste characteristics. Further, Mr. Pappas indicated that the mine may not have progressed into all sections represented by roof and floor analysis.

I expressed the Division's keen interest in knowing the location of the high boron waste. We agreed to further dialogue on the issue.

20. Air Quality Permit

Dust control is needed during construction.